

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
Felicia Owens : Bankruptcy No.: 18-16627
35 Dewey Road : Chapter 13
Cheltenham, PA 19012 :
Debtor

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

And now Comes Felicia Owens, by her attorney, Teresa Brady, Esquire, who answers the request for relief from the automatic stay and avers as follows:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor has paid all payments, see attached Exhibit A, payments made in 2020.
7. Denied. Debtor has paid all payments, see attached Exhibit A, payments made in 2020.
8. Denied. Debtor has paid all payments, see attached Exhibit A, payments made in 2020.
9. Denied. Debtor has paid all payments, see attached Exhibit A, payments made in 2020.
10. Denied. Debtor has paid all payments, see attached Exhibit A, payments made in 2020.

Affirmative Defense and New Matter

11. Debtor is current post-petition, see Exhibit A.
12. Debtor has applied for a modification.
13. No payment history was attached to the motion and Debtor requests said history from the moving party.

WHEREFORE, debtor requests that the motion for relief from automatic stay be denied.

Respectfully Submitted,
/S/TeresaBrady,Esquire
Teresa Brady, Esquire
Attorney for Plaintiff
210 East Girard Avenue
Philadelphia, PA 19125
Phone (215)-426-1020

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Debtor	:	

JUDGE'S ORDER

AND NOW this _____ day of _____, 2020,
upon consideration of the Answer to the Motion of Movant for Relief from the Automatic
Stay, Bankruptcy Code Section 362, and notice and opportunity for the hearing thereon, it
is hereby

ORDERED, that the Motion be, and the same is hereby DENIED, and the
Automatic Stay of 11 U.S.C. §362 (a) remains in place.

BY THE COURT:

J.

Exhibit A

11/30/2020

BillPay | Activity

Date Range

Year to date

Jan 01, 2020 to present

Filter By

Recipient Name

Freedom Mortgage *5268

Showing Freedom Mortgage payments. [Clear Filter](#)

Showing 1 - 20 of 20 payments

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DESCRIPTION	CATEGORY	AMOUNT	DELIVER BY	STATUS
Freedom Mortgage *5268	Mortgage	\$2,000.00 *9792	1-2-20	Processed Cfm # PW8C2-CT3D1
Freedom Mortgage *5268	Mortgage	\$2,099.00 *9792	1-31-20	Processed Cfm # PXZWT-6M3N4
Freedom Mortgage *5268	Mortgage	\$2,099.00 *9792	3-2-20	Processed Cfm # Q22XS-009H9
Freedom Mortgage *5268	Mortgage	\$2,099.00 *9792	4-30-20	Processed Cfm # Q76GN-BML6D
Freedom Mortgage *5268	Mortgage	\$2,000.00 *9792	5-29-20	Processed Cfm # QCJYX-YXRKB
Freedom Mortgage *5268	Mortgage	\$1,099.00 *9792	6-30-20	Canceled Cfm # QGLL9-W4JK0
Freedom Mortgage *5268	Mortgage	\$1,000.00 *9792	7-15-20	Processed Cfm # QGLLG-6H6KC
Freedom Mortgage *5268	Mortgage	\$1,000.00 *9792	7-28-20	Processed Cfm # QKSS1-7R181
Freedom Mortgage *5268	Mortgage	\$2,099.00 *9792	8-3-20	Processed Cfm # QL8RJ-R5C1L
Freedom Mortgage *5268	Mortgage	\$2,099.00 *9792	8-31-20	Canceled Cfm # QNP9L-NKZ3N
Freedom Mortgage *5268	Mortgage	\$1,099.00 *9792	9-1-20	Processed Cfm # QPCZ0-X8F9Q
Freedom Mortgage *5268	Mortgage	\$500.00 *9792	9-16-20	Canceled Cfm # QQWTD-GS5RS
Freedom Mortgage *5268	Mortgage	\$1,949.00 *9792	9-29-20	Canceled Cfm # QS7Y0-WKTCZ
Freedom Mortgage *5268	Mortgage	\$3,099.00 *9792	9-30-20	Canceled Cfm # QQWZN-2YVG4
Freedom Mortgage *5268	Mortgage	\$2,099.00 *9792	9-30-20	Canceled Cfm # QS0R5-DMXJW
Freedom Mortgage *5268	Mortgage	\$1,949.00 *9792	9-30-20	Canceled Cfm # QS7Y1-S97NF

Total \$17,693.00 Pending, Processing, and Processed payments only, including any fees

11/30/2020

BillPay | Activity

DESCRIPTION	CATEGORY	AMOUNT	DELIVER BY	STATUS
Freedom Mortgage *5268	Mortgage	\$1,900.00 *9792	9-30-20	Canceled Cfm # QSBTH-BKP4L
Freedom Mortgage *5268	Mortgage	\$1,099.00 *9792	9-30-20	Processed Cfm # QSBTX-4DFC2
Freedom Mortgage *5268	Mortgage	\$2,000.00 *9792	10-15-20	Canceled Cfm # QSBTZ-4CCYB
Freedom Mortgage *5268	Mortgage	\$1,099.00 *9792	11-30-20	Processed Cfm # QZDS4-X74PQ
Total		\$17,693.00	<i>Pending, Processing, and Processed payments only, including any fees</i>	

Showing 1 - 20 of 20 payments

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CERTIFICATE OF SERVICE

I, Teresa Brady, Esquire, attorney for Felicia Owens, hereby certify that a true and correct copy of the forgoing Answer was forwarded to the following electronically on December 1, 2020.

Office of the Clerk
US Bankruptcy Court
900 Market Street
Suite 400
Philadelphia, Pa 19107

Chapter 13 Trustee

US Trustee's Office

Debtor

Rebecca A. Solarz
KML Law Group, P.C.
Suite 5000- BNY Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532

/S/TeresaBrady,Esquire
Teresa Brady, Esquire
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